

Barcomb, Alicia (USTP)

From: BlackStone LLC <texasblackstone@gmail.com>
Sent: Wednesday, January 10, 2024 10:30 AM
To: William Haddock; Ann Banda; shylanda sampson; BlackStone LLC
Cc: Barcomb, Alicia (USTP); Sylvia Mayer
Subject: [EXTERNAL] FTR 1/10/23 Cause # 23-33848 Meeting Request(All) -Creditor Update

Good morning all,

I would like to follow up on the plan to ensure that nothing has been sent out on 1/8/24. I would like to follow up on our meeting request. Additionally, I would like to provide an update to include a potential claim under Steve Orr's Policy No. GLITCH 00201 4022 with Third Coast Insurance Company. The claim is for an amount of \$13,331.64, pending verification...just to be on the safe side.

We are eager to discuss all of the changes and amend them accordingly. We would like to schedule a meeting as soon as possible. We have sent previous emails regarding this and plan to call tomorrow, January 11, 2023, at 10 am unless we can confirm a meeting time before then. Thank you for your attention to these matters. We look forward to your prompt response and confirmation of a meeting time.

On Tue, Jan 9, 2024 at 2:07 PM BlackStone LLC <texasblackstone@gmail.com> wrote:

Hello all,

I pray that all is well. Following up on the status of the non consent of plan that was submitted on 1/2/24 and also Request for Trustee Service , following up. See Below breakdown to support the Debtors request. Also following up on the best time to meet. We have a lot to discuss.

Trustee Facilitate the development of a consensual plan of reorganization

The Debtor has an undisputed title and the Debtor has a Right to demand disclosure in connection, and negotiations with subsequent creditors and purchasers for the purpose of establishing his credit standing and proving which of his assets are free of the security interest. This right has been systematically obstructed, thus impeding the Debtor's ability to navigate governmental proceedings state, civil and federal proceedings involving "live conflicts", claim and disputes which supports the Debtor's desperate need of Trustee to "facilitate the development of a consensual plan of reorganization in a transparent, fair and just manner. These allegations, if proven, could have a significant impact on the credibility and legality of the claims made by Bellum in the bankruptcy case.

BELLUM CIVILE Case: 1188903, Bellum Civile, LLC vs Black Stone Investment Group, County Civil Court Law Court 1 - Honorable Audrie Lawson Evans (Submission of Bankruptcy Filing/Previous Counsel Email)

Case: 202267980 , Bellum Civile, LLC vs Black Stone Investment Group, Court District Court Law Court 281 -Honorable Christine Weems (Submission of Bankruptcy Filing/Previous Counsel Email)

Case: 202307511 Black Stone Investment Group vs Bellum Civile, LLC vs Court District Court Law Court 55th -Honorable Latosha Lewis Payne (Submission of Bankruptcy Filing)

Cause 202340826 Black Stone vs. Bellum Civile in District Court Law Court 55th -Honorable Court 080 Honorable Jeralynn Manor (Submission of Bankruptcy Filing)

Trustee Power to Investigate Fraud : Given the severe implications of their situation, the debtor has actively sought the trustee's intervention to thoroughly investigate claims of fraud, both pre- and post-petition. Debtor requests Trustee assistance to be employed in Pursuant to 11 U.S.C. Section 1106(a)(3), to "investigate the acts, conduct, assets, liabilities, and financial condition of the debtor, the operation of the debtor's business and the desirability of the continuance of such business, and any other matter relevant to the case, and alleged manipulations in multiple cases related to the debtor.. If fraud is substantiated, the trustee can take appropriate legal actions, which could include civil or criminal proceedings as well as relevance to the formulation of a plan." The Debtor requires the Trustee services to ensure that any fraudulent activities are accounted for in the reorganization plan and that such activities do not unduly influence the plan's structure or the distribution of assets and the Debtor is entitled to judgment as a matter of law." claim to recover its alleged overpayment "the correct [payoff] amount" as relating to alleged violation of 523(a)(4): debts arising from fraud or defalcation while acting in a fiduciary capacity, embezzlement, or larceny

Trustee Power Rule 9011: The Debtors call upon the Trustees uniquely empowered involving these judicial proceedings and this bankruptcy case, the indispensable role of the trustee, as defined by Rule 9011 of the Federal Rules of Bankruptcy Procedure prays to rely on the Trustee to uphold the integrity and fairness of the bankruptcy process, an obligation that becomes all the more critical in complex and contentious cases like this one. The outcomes of these investigations are not just procedural formalities; they carry significant weight in determining the resolution of the bankruptcy case and will have lasting implications on the debtor's financial future. These allegations, if proven, could have a significant impact on the credibility and legality of the claims made by Bellum in the bankruptcy case.

Trustee Role Ensure Accurate and Reliable Financial Reporting Pre/Post

The Debtors call upon the Trustees authority to access, review, and analyze the debtor's financial statements. If discrepancies or misrepresentations are found, the trustee has the power to correct them. This is crucial for presenting a truthful and transparent picture of the company's financial status. The trustee's role in restoring the fundamental right to reliable financial information is paramount in the reorganization process. This involves not only correcting past inaccuracies but also setting up mechanisms to ensure ongoing accuracy and transparency in financial reporting.

Trustee Enforcing Violations: Debtor requests Trustee assistance assist in Enforcing the Automatic Stay that Has been Violated Blackstone Investment Group LLC vs Bellum Civile LLC, 80 th District Court, Harris County, Texas
Cause number: 2023-40826 , the Debtor pre petition claim
Fraudulent Transfer, Property Title dispute 3425 Mainer

Trustee Assistance in 2018-2023 Taxes-Debtor requests Trustee assistance in obtaining and verifying financial information required for 2018-2024 tax filing rights tax filing rights, discrepancies, and ensuring compliance, the plan will significantly contribute to the financial restructuring and stability of the company. The plan will ensure that these investments are accurately accounted for, including the basis and entitlements associated with these assets. The goal is to rectify any misrepresentations and ensure that the Debtor's financial position.

Trustee in Examining proofs of claim and objection to improper claims (Section 704(a)(5)) Debtor requests Trustee assistance /the trustee has the power to issue subpoenas to gather financial information in the reorganization plan essential for Blackstone Investment Group and address address and resolve the issues stemming from deprivation of financial statements and the proper accounting of financial assets involving constraints of past financial misappropriations and misrepresentations.

Trustee in assisting with a "Debtor's Bond of Indemnitor" Debtor requires trustee assists with a "Debtor's Bond of Indemnitor," considering the complications n cases involving alleged claims of fraud, their role is multifaceted and crucial for the integrity of the bankruptcy process to ensure Legal Compliance and Adequate Protection for the bankruptcy estate.

Trustee has the power to issue Subpoenas in Plan. Debtor request Trustee assistance, as Trustee has the power under fraud allegations , advocating for such sanctions where appropriate to uphold the integrity of the bankruptcy process. Subpoenas can compel the production of evidence that is essential for a comprehensive understanding of the situation and for verifying the validity of the claims made.

Trustee has the power to Mandate for Full Disclosure: Debtor requests Trustee assistance with ensuring that there is full disclosure concerning representation, live conflicts, financials,. This includes verifying that all pertinent information about the bond and the indemnitor is transparently presented to the court and all interested parties. In cases with fraud allegations, the importance of this disclosure is amplified, as it aids in informed decision-making by the court and creditors and ensures the fairness of the proceedings.

Trustee Assistance in Organizing and Enforcing Debt Recovery of the Estate in Plan

Debtor requests Trustee in organizing and enforcing Estate Assets and Recovery of Est. Value /Non Restricted Restricted Assets Restricted Financial Estimated \$1,1562.17.00 to be collected for disposable income for the Creditors interest to be distributed fairly and equitable for ALL interest;

+Est. Value Restricted Assets Restricted Assets \$375,000 : Other noncurrent assets Particularly Financial Assets UCC § 8-103, 8-104 The trustee or other liquidator, acting on behalf of all entitlement holders having security entitlements with respect to a particular financial asset, may recover the financial asset, or interest therein, from the purchaser. UCC § 8-103 and 8-104 As entitlement holders, Blackstone retains the right to enforce property interests against securities intermediaries, especially in light of alleged breaches under § 28:8-504

+Est. Aggregated Value \$ 159,481.11 Interest Expense Payment(s) -Correction(s) Error(s) -System Open Market Account (Updated as per 11/20/23) Payments were not credited to the borrower's account as of the date they were received by the servicer, which is a requirement under 12 CFR 1026.36(c)(1).

+Est. Value \$200,989.06 Est. Value Due and Owing to Blackstone: Financial Liabilities Disaster Relief Funds Texas Severe Winter Storm (EM3554TX)Contractual

+Long Term Receivable(s) - Erroneous Accounts Receivable" review to verify the completeness, accuracy, and supportability of all receivables ; correcting discrepancies in records, concerning principal loan amounts, payments, and interest, to ensure an accurate representation of the business's financial status. A compliance audit must be conducted (**cost TBD**) as per 5 USC 801(a)(2)(A), 12 CFR 1026.36(c)(1), 12 CFR 1024.34(a).

+ Est. \$150,275 total aggravated approx Inventories and other current assets -Material/Inventory/Tools/Supplies/Machinery to hire professional assess damages and sale

+Est. Value Restricted Assets \$221,831 : Particularly Investments held by Sentient LLC to sale and or negotiate

+Est. Value Investment Property(Exclude Sentient) \$519,367000

Total Recovery \$1,1562.17.00

OPEN CASES

Case: 1188903, Bellum Civile, LLC vs Black Stone Investment Group, County Civil Court Law Court 1 -Honorable Audrie Lawson Evans(Submission of Bankruptcy Filing/Previous Counsel Email)

Case: 202267980 , Bellum Civile, LLC vs Black Stone Investment Group, Court District Court Law Court 281 -Honorable Christine Weems (Submission of Bankruptcy Filing/Previous Counsel Email)

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Blackstone Investment Group LLC vs Bellum Civile LLC, 80 th District Court, Harris County, Texas

Cause number: 2023-40826 the debtor has a Fraudulent Transfer, Property Title dispute for two propeties Mainer and Brailsfort as well as a Lis Pendens for two properties

Cause No. 202249770 - PDA HOA 5801 Winsome Inc.Black Stone vs. Koorosh Olyaie, et al.

Jurisdiction: 333rd Harris County District Court 20,000 approx

Cause No. 22DCV298782 Black Stone Investment Group vs. Allette B. Williams

Jurisdiction: 434th Fort Bend County District Court State Auto Insurance Claim: \$63,816.68 approx

On Mon, Jan 8, 2024 at 6:14 AM BlackStone LLC <texasblackstone@gmail.com> wrote:

The debtor, Blackstone Investment Group, does not confirm the plan of SBA under Chapter 11 Title 5 that was submitted on January 2, 2024 . Debtor is requesting notification of the court for modification .

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January 6, 2024

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RE; For the Record Debtors Official Notification Plan Not Confirmed -Debtor Does Not Consent-Debtor Request to Amend Plan

Amendment and Update of Schedules and Financial Documentation in Blackstone Investment Group's Bankruptcy Proceedings:

To ensure compliance and accuracy in Blackstone Investment Group's ongoing Chapter 11 bankruptcy proceedings, it is crucial to amend and update all relevant schedules, financial statements, and documentation. This process includes incorporating recent contracts, legal cases, and financial updates, thereby reflecting the current status of the debtor's affairs.

Amendment and Update Remove James Alm for Schedules and Financial Documentation in Blackstone Investment Group's Bankruptcy Proceedings:

This is an error , James Alm alleged transfer of property to Bellum Civile.

Amendment and Update Remove Klien Taxes

Correcting any inaccuracies regarding property tax liabilities

Bankruptcy History

Bankruptcy Filed under Chapter 7, individual on June 5, 2023. Brendon Singh, was counsel to the case and was assigned case number 23-33848 to Chief Judge Eduardo Rodriguez. The case was dismissed, as there were complications in processes which Debtor learned that

would benefit the debtor, "a party of interest" as well as the debtor's creditors.

that Bankruptcy filed under Small Business Bankruptcy Chapter 11 Subchapter 5 on October 2, 2023 case was assigned case number 23-33848 to Judge Marvin Isgur and then reassigned to Chief Judge Eduardo Rodriguez.

No Confirm of Plan - Request for Submission of a New Plan

The debtor, Blackstone Investment Group, does not confirm the plan of SBA under chapter 11 Title 5 that was submitted on January 2, 2024. Debtor is requesting notification of the court of modification.

Debtors initial submissions as the Part A of Plan was submitted in November 2023, and Amended Part A was submitted in December 20, 2023 w/ Balance Sheets.

Debtor was awaiting response of approval/disapproval and guidance of Trustee and Counsel since November 2023 and was not involved in the January 2, 2024 submission of the "Plan of Reorganization for Small Business Chapter 11" and the Debtor's Consensual Plan absent Trustee. Debtors' disagreement with the proposed reorganization plan highlights significant concerns regarding fairness, transparency, legal compliance, and legally compliant restructuring process. The Trustee's proactive involvement in rectifying the plan, addressing conflicts, and conducting thorough audits is imperative in safeguarding the interests of all parties and facilitating a just resolution to the bankruptcy case. The plan that was submitted was formulated without the active involvement of the debtor and in the absence of requested collaboration with the Trustee, rendering it unfulfilled to Debtor's interest and other creditors under Chapter 11/5 of the Bankruptcy Code and Consensual Plan.

The Debtor does not confirm the accuracy of information and requests modifications. The Debtor believed that there were inaccuracies in the January 2, 2024 submission of the "Plan of Reorganization for Small Business Chapter 11" apart from the Debtors Proposed "Financial Organizational Plan-(Minority Family Owned Small Business)" plans and does not seem to employ all provisions and benefits in all interest of recovery off all debts of the estate and Trustee. The Plan submitted did not involve accurate information it is our belief that it was last updated on October 2023. This will need to be amended. There is misinformation that needs to be updated.

Attendance at a meeting of creditors pursuant to 11 U.S.C. § 341(a).

Debtor identified pre/post petition claims of fraud. The Trustee should work to ensure that any claims of pre and post-petition fraud are properly documented in the reorganization plan and that appropriate legal actions, Rule 9011 including federal investigations, are initiated where necessary.

Need to work with Counsel of Trustee and Notify the Court

Under 11 U.S.C. § 327, the Bankruptcy Code mandates that attorneys involved in bankruptcy cases must be disinterested and not hold or represent any interests adverse to the estate they are representing. The presence of a "live" conflict, as alleged in this case, directly contravenes this requirement and raises concerns about the integrity of the legal representation provided. Trustee Investigation

The Trustee has an obligation to Report Fraud to the Court and Investigating Alleged criminal, fraudulent, or abusive conduct for possible civil or criminal prosecution.

Adverse claim against Debtor and securities intermediary (s) as the Debtor has a property interest in a financial asset and that it is a violation of the rights of the claimant for another person to hold, transfer, or deal with the financial asset. A genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law." claim to recover its alleged overpayment "the correct [payoff] amount" as relating to alleged violation of 523(a)(4): debts arising from fraud or defalcation while acting in a fiduciary capacity, embezzlement, or larceny. Note: The error of records must be corrected to reflect the principal loan amount, exclude fraudulently withheld and segregated funds, and account for overpayments and interest. Failure to credit payments according to regulations, such as 12 CFR 1026.36(c)(1), is alleged, resulting in misappropriation of funds.

Right to Financial Statement At the heart of these challenges is the fundamental right of a business to produce and rely upon accurate financial reports. This right is essential for the integrity of business operations and for the trust of all stakeholders, including investors, creditors, and employees. The reorganization process will focus on restoring this fundamental right, ensuring that going forward, Blackstone has access to reliable and precise financial information for its decision-making processes. The Debtor has an undisputed title and the Debtor has a Right to demand disclosure in connection, and negotiations with subsequent creditors and purchasers for the purpose of establishing his credit standing and proving which of his assets are free of the security interest. The plan must address and resolve the issues stemming from deprivation of financial statements and the proper accounting of financial assets involving constraints of past financial misappropriations and misrepresentations.

Bar Claim- Abuse of Process in Cases 202267980, 202307511, and 1188903-Multiple Investment Proceedings, Same Party(s), Claims(s) and harm(s). This allegation pertains specifically to the following cases: District Case 202267980, District Case 202307511, and County Case 1188903. In our view, this practice extends the doctrine of abuse of process beyond its traditional boundaries in the realm of corporate restructuring. In these cases, it seems that claims for identical economic harm are being prosecuted in multiple

forums that provide similar substantive due process and procedural protections, thereby undermining the integrity and efficiency of the dispute resolution process. This pattern of litigation not only places an undue burden on the parties and the courts but also threatens the legitimacy of the Investor-State Dispute Settlement system as a whole.

Alleged Violation of (Role SEC-registered investment adviser/ administrative agent on behalf of the loan syndicate Title Company Custody Rule)

TransAct ID 45-3483105 d/b/a Salima T. Umatiya d/b/a Umatiya Law Firm d.b/a TransAct Title, LLC, Mansoor Chaudhry , Amanda Kimbrough

Patriot ID 81-0749101 d/b/a Genevine B Estrade d/b/a Estrada & Edwards Group LLC ,Secured Title d/b/a Sylvester Williams d/b/a Sylvester Williams & Associates, the debtor has alleged

substantial loss due to breach of fiduciary, duty and defalcation., failure to recuse to non interest holding, misappropriation of trust and property Obligations between the title company and the debtor, particularly in relation to Bellum Civile property acquired.

Status of any litigation pending in or outside this Court-OPEN

Allegations of fraud against Bellum involving the above mentioned open proceedings in state and district court necessitate a thorough investigation by the Trustee. These allegations, if proven, could have a significant impact on the credibility and legality of the claims made by Bellum in the bankruptcy case. The Trustee must ensure that any fraudulent activities are accounted for in the reorganization plan and that such activities do not unduly influence the plan's structure or the distribution of assets.

Case: 1188903, Bellum Civile, LLC vs Black Stone Investment Group, County Civil Court Law Court 1 -Honorable Audrie Lawson Evans (Submission of Bankruptcy Filing/Previous Counsel Email)

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Right to challenge the secured status of a creditor. Bellum Civile, LLC.

Debtors have the right to challenge the secured status of a creditor, particularly if there are issues related to the nature of the underlying debt and alleged the existence and legitimacy of the security interest. In active litigation there is an absence of discovery as well as abstract or Judgment lien for Creditor Bellum Civile LLC. This claim should not be secured until verified no bias in classification of distribution . Debtor has notated appears to be "charging" the default rate of interest from the date of maturity of the Note , without regard to payments made on the Note since that time. Demand was made for immediate breakdown and accounting of the amounts .Alleged deliberate withholding/ manipulation of financial records and statements impedes the borrower's ability to keep track of their debts, payments, and overall financial health. This cloud of uncertainty can lead to wrongful penalties, excessive interest charges, and unwarranted debt accumulation. failed to respond to the borrower's demand for a complete accounting, it takes the position that no payments have been made as the payoff amounts previously demanded. There is a Year to date receipt of \$189,000. Debtor demanded an accounting of the payoff amount on all Notes, breaking down principal, interest (non-default and default), and expenses added to the balance due pursuant to the Notes and the security instruments, taking into account all payments made by the Maker of the Notes and escrow amounts held by the prior noteholders in connection with the Notes. (From June 2022-Present)

Please also see attached Trustee Assistance to be also included in Blackstone Investment Group's Reorganization Plan; would like to include the Trustee Counsel in this Facilitation as these are some extremely complex webs.

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